



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue
Seattle, Washington 98101

SEP 13 1993

Reply To
Attn Of: HW-113

Roger Turner
307 North Buchanan
Pocatello, Idaho 83204

Dear Mr. Turner:

This is in response to your letters of July 16, 1993, and August 5, 1993, regarding the phosphorus slag issue. I will first address your comments on the Methods Development Study.

You are correct that the methods study does not discuss all the historical data collected on slag. The purpose of this study is to follow through on the recommendations of EPA's independent Science Advisory Board (SAB). We believe that through our active community outreach the communities are aware of the findings of previous work and the outstanding issues. We will continue to issue fact sheets and hold public meetings to advise the communities on the progress of this and future efforts to address this issue. In addition, as you may be aware, our Technical Work Group (TWG) has representatives from government, industry, and the communities who are working closely together on this issue.

We appreciate your concerns on fugitive dust and alpha emissions from slag during construction activity and we have carefully considered your comments. It is our understanding that the original Idaho Radionuclide study looked at this issue and eliminated it from further consideration due to apparent low risk. The SAB **did not** fault the Idaho Radionuclide Study for taking this course of action. However, in order to fully address your concerns we will raise this issue, in the form of your letter, for discussion among the members of the technical work group. We will include information on this issue, along with the recommendations of the TWG, in an upcoming fact sheet.

The alpha concentration you referenced in your letter was taken from the Pocatello Sewage Treatment Plant which is directly downwind of the FMC and Simplot Plants. There are a variety of sources of emissions, other than slag, from the plants that may impact the concentrations seen at this location. The RI/FS for the Eastern Michaud Flats site will be looking at this issue in the air pathways analysis. Air Monitoring, air modeling, and emissions characterizations should help to determine the sources and nature of hazardous constituents found in areas surrounding these Companies.

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The evaluation of potential harmful effects of ingestion and respiratory inhalation of slag is beyond the scope of the Methods Study and was not a recommendation made by the SAB. However, this issue will be addressed during the course of the human health risk assessments being conducted for FMC and Monsanto under the Superfund Process. As you are aware, slag has been used extensively at these facilities and is the major constituent in surface samples collected during the RI/FS at these two facilities. Consequently, inhalation and ingestion of slag will be evaluated in this context.

With regards to your comments on Bannock Paving's continued use of slag, FMC told us that they voluntarily stopped selling slag. However, they are continuing to honor a preexisting contract with Bannock regarding an existing stock pile. When we negotiated the Consent Order we were unaware of the contract and of Bannock's continuing use of slag. We intend to pursue curtailing this use.

Finally, I would like to address our rationale for not including Bannock in the current Consent Order for slag. Our goal in conducting the methods study and subsequent exposure study is to definitively assess the risk from slag. FMC and Monsanto, the principal slag producers, were deemed the appropriate entities for conducting these tasks, particularly given their size and resources relative to Bannock or other smaller entities. The results of these studies and the development of the graded decision guidelines will determine what, if any, action should be taken to address the risk from slag. At that time EPA will consider all appropriate implementation and enforcement issues.

Should you have additional questions or feel that we have not adequately responded to your comments please contact me at (206) 553-2806.

Sincerely,



Bill Adams
Project Coordinator

cc: Pat McGavran, IDOH
George Spinner, IDEQ
Dan Phalen, WD
Mark Masarik, IOO
Charles Ordine, ORC